



FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

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2010 JUL 16 P 4:11

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Thomasenia P. Duncan
General Counsel

Kathleen M. Guith
Acting Associate General Counsel for Enforcement

Stephen A. Gura
Deputy Associate General Counsel for Enforcement

BY: Julie K. McConnell
Assistant General Counsel

William A. Powers
Attorney

SUBJECT: MUR 6129 (American Resort Development Association – Resort Owners
Coalition PAC) ---Pre-Probable Cause Conciliation

Attached is a proposed conciliation agreement that has been signed by counsel on behalf of American Resort Development Association – Resort Owners Coalition PAC and Sandra Yartin DePoy, in her official capacity as treasurer (the “ARDA-ROC PAC” or the “Respondent”). Attachment 1. The agreement would settle the Respondent’s violations of 2 U.S.C. §§ 434(b), 441b(a), 441b(b)(3)(B)-(C), 441c(a), and 11 C.F.R. § 114.5(a), in connection with its misstated financial activity, prohibited corporate and foreign national contributions, and improper solicitation of contributions from 2003-2007.

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Therefore, we recommend that the Commission accept the attached conciliation agreement and close the file as to all respondents in this matter.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with American Resort Development Association – Resort Owners Coalition PAC and Sandra Yartin DePoy, in her official capacity as treasurer.
2. Approve the appropriate letter.

3. Close the file in this matter.

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